

**From:** Beth Ericksen  
**To:** Ed\_Ginouves@blm.gov  
**Date:** 05/21/2008 10:50 AM  
**Subject:** Re: DOGM: M021030 BRIGHT 1 & 2

M/021/030  
PIC  
Escalation  
Plan Eval.

Hi Ed,

Thank you for your timely response. I left a message for you today, and please, if I have failed to express the escalation circumstances clearly, please contact me and we can have further discussion.

Yes, it is very important to monitor and evaluate the dynamics related to economics, resources, and operations that ultimately influence how achievable the reclamation plan will be. We have been stressing the importance that these influencing factors will affect whether reclamation is successful, from an environmental *and* economic perspective.

When we have the meeting with them to evaluate the mining and reclamation plan, your concerns will be addressed. If the bond amount is adjusted as a result of a plan modification, the operator will have to go through the bond process again after escalation. Unfortunately, the duration of time it takes to modify a plan is slow, therefore, the existing bond amount doesn't get escalated, resulting in a non compliance issue. If plan modifications were quick and painless, we would tie the escalation into that effort, unfortunately, that has never been the case.

Thank you again for your email and information. Please call or email if you would like to have a more in depth discussion.

Beth

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>>> <Ed\_Ginouves@blm.gov> 05/21/2008 9:40 AM >>>

Hi Beth:

This is in response to your draft letter to escalate the bond amount for the Bright Quarry large mine permit for the five year period ending 2013. I do not have any problem with the escalation of the bond amount per se, but the base amount on which this escalation is based might be in need of adjustment. While the current disturbed areas are still well within the maximum gross disturbed areas bonded for reclamation, but the volumes of unsold waste rock (boulders and fines) are probably insufficient to obtain 2: 1 re-sloping of the quarry areas through backfill - as the current reclamation plan calls for. the operator has, of course, been trying to develop markets for everything and anything it mines and large volumes of what were originally thought to be unmarketable waste fines (chat) have been sold and are not available for reclamation purposes. Hence it may be

necessary to modify the reclamation bond estimate to reflect changes in reclamation procedure to obtain acceptable pit highwall re-sloping.

Please note that the BLM case file for this site is UTU-79703; the 77247 file was a predecessor file that has since been closed out.

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